ATTACHMENT 3 TO AMERITECH ILLINOIS' REPLY

Illinois Commerce Commission
Docket 01-0662
McLeodUSA On The Record Data Request 9

Request:

Regarding the testimony of McLeod's witness Sprague:

1. Provide the names of the individuals that assisted Mr. Cottrell in his investigation.
2. Copies of all documents, including all X12 responses provided by SBC to McleodUSA in the joint test environment reviewed by Mr. Cottrell or the individuals that assisted him in his investigation that he considered in reaching his stated conclusion that the problems identified by Ms. Sprague were actually due to McleodUSA 's failure to implement industry standard mapping rules.
3. Identify the account team members that told McleodUSA that its failure to implement industry standard mapping was the cause of the problems identified by Ms. Sprague, with whom at McleodUSA this discussion was held, and when this discussion occurred.
4. Copies of all X12 responses that SBC provided to McleodUSA in the joint test environment showing where the SLA will be provided to McleodUSA by SBC via the EDI. The X12 response should highlight the SLA by bolding all code lines related to the SLA.
5. Copies of all X12 responses that SBC provided to McleodUSA in the joint test environment showing where Hunting will be provided to McleodUSA by SBC via the EDI. The X12 response should highlight the Hunting by bolding all code lines related to Hunting.
6. Copies of all X12 responses that SBC provided to McleodUSA in the joint test environment showing where Calling Card information will be provided to McleodUSA by SBC via the EDI. The X12 response should highlight the Calling Card information by bolding all code lines related to the Calling Card.
7. Provide a copy of the X12 documentation published by SBC on its CLEC website for LSOG 5. Provide the current version and if the X12 has been modified since the joint test environment was opened, each individual iteration of the X12 that has been published by SBC on its website.
8. Provide a definitive clear statement stating where the SLA will be in the X12 response provided to McLeodUSA in response to McLeodUSA CSI transaction submitted using LSOG 5 EDI; clearly state whether the SLA will always appear in the same location on each X12 response, identify each such potential locations and what variables control the location of the SLA. Finally, if SBC cannot identify with certainty where the SLA will appear in the X12 response, acknowledge that SBC cannot provide the location with certainty at this time.
9. Provide a definitive clear statement stating where Hunting will be in the X12 response provided to McLeodUSA in response to McLeodUSA CSI transaction submitted using LSOG 5 EDI; clearly state whether Hunting will always appear in the same location on each X12 response, identify each such potential locations and what variables control the location of Hunting. Finally, if SBC cannot identify with

certainty where Hunting will appear in the X12 response, acknowledge that SBC cannot provide the location with certainty at this time.

10. Provide a definitive clear statement stating where Calling Card information will be in the X12 response provided to McLeodUSA in response to McLeodUSA CSI transaction submitted using LSOG 5 EDI; clearly state whether Calling Card information will always appear in the same location on each X12 response, identify each such potential locations and what variables control the location of Calling Card information. Finally, if SBC cannot identify with certainty where Calling Card information will appear in the X12 response, acknowledge that SBC cannot provide the location with certainty at this time.

Response:

1. The following individuals assisted Mr. Cottrell in his investigation:

Sherri Mitchell	Senior Technical Director
Laura Stevenson	Senior Analyst
Kim Nolen	Team Leader - Application Development
Mike Scipio	Associate Director – OSS Customer Support
Christopher Gallagher	Senior Business Manager
Melanie Frank	Team Leader – Application Development

2. Ameritech only retains Electronic Data Interchange ("EDI") responses sent from the Joint Test Environment ("JTE") for 45 days. However, the EDI responses that McleodUSA is requesting were available at the time Mark Cottrell developed his Surrebuttal Testimony. In addition, the EDI responses were reviewed by the team members identified in the response to DR 1. Attached are a series of emails that were sent between McLeodUSA and Ameritech related to EDI. What these emails show is that SBC Ameritech was working proactively with McLeodUSA to answer their questions related to formatting of the EDI messages that SBC Ameritech was sending McleodUSA.


Microsoft Word Document

The documents below were sent to Michelle Sprague and Mary Camper of McLeodUSA on March 22, 2002. In addition, the document was reviewed during a conference call that was held with Michelle Sprague and Mary Camper of McLeodUSA and Christopher Gallagher and Brian Bearden of SBC Ameritech. The same document was sent again on June 11, 2002 to Chris Foster of McLeodUSA. Another conference call was held to review the document with Chris Foster, Josh Reynolds, and Linda Lane, all of McLeodUSA.

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"SLA FID.doc"

The chain of emails below followed a conference call that was held on June 11, 2002 between McLeodUSA and SBC Ameritech. Representing McLeodUSA were their developers: Josh Reynolds, Linda Lane, Chris Foster, And Ahju. Representing SBC Ameritech were: Dennis Scheussler, Laura Stevenson, Kim Nolen, Christopher Gallagher, Melanie Frank, Michael Scipio, and Riccardo Lacey. Michelle Sprague did not participate on the call.


Microsoft Word Document

Below are emails related to Secondary Location Address ("SLA") Field Identifier ("FID") related to Calling Card and Hunting. The SLA FID is a field identifier that indicates that the information that follows the FID is the SLA.


Microsoft Word Document

3. The SBC Ameritech account team members that participated on conference calls with McLeodUSA included Mike Scipio, Christopher Gallagher, Melanie Frank, Kim Nolen, Brenda Brundage, and Riccardo Lacey. Michelle Sprague, Josh Reynolds, and Chris Foster represented McLeodUSA. The conference calls were held with McLeodUSA to review and clarify business rules and EDI mapping.

4. Ameritech's Joint Test Environment only retains X12 EDI responses for 45 days. The electronic X12 responses requested by McLeodUSA have not been retained. However, the X12 responses that McLeodUSA is requesting were available at the time Mark Cottrell developed his Surrebuttal Testimony and were reviewed by the team members identified in DR1 above who assisted Mr. Cottrell in his investigation.

5. Ameritech's joint Test Environment only retains X12 EDI responses for 45 days. The EDI responses requested by McLeodUSA have not been retained. However, the X12 responses that McLeodUSA is requesting were available at the time Mark Cottrell developed his Surrebuttal Testimony and were reviewed by the team members identified in DR1 above who assisted Mr. Cottrell in his investigation.

6. Ameritech Joint Test Environment only retains X12 EDI responses for 45 days. The EDI responses requested by McLeodUSA have not been retained. However, the X12 responses that McLeodUSA is requesting were available at the time Mark Cottrell developed his Surrebuttal Testimony and were reviewed by the team members identified in DR1 above who assisted Mr. Cottrell in his investigation.

7. Attached is the current CSI Sample Mapping Document available on the EDI Website.


CSI.doc

The following is a list of the Previous LSOG 5 CSI Sample Mapping documents that were posted to the Website which are also attached.

- Original Document
- January 2nd Update which added IN203 element to LNFN Field
- February 6th Enhancement, added explanation of Feature/Feature Detail Section
- February 8th Update added missing "NAME" field from Header Section of Response
- March 20th Enhancement added note to explain return of Account Level information


"Original CSI.doc"


"Jan 2nd CSI.doc"


"Feb 6th CSI.doc"


"Feb 6th CSI FEATURES.doc"


"Feb 8th CSI.doc"


"March 20th CSI.doc"

8. SLA FIDs will be returned in the FEATURE DETAIL Field on a CSI Response. The FEATURE DETAIL Field is mapped to the SI Segment using the FD qualifier, and is located in the SLN loop of the response.

Two types of FID data are used to return SLA information.

1. Floating FIDs are used to identify the SLA that is assigned to the working telephone numbers (WTNs) on the account. These FIDs can be identified by the presence of a virgule (/) before the SLA identifier, e.g., /SLA 1111

   The SLA Identifier is tied to a specific WTN on the account, and will be mapped in the SLN loop that is subordinate to the PO1 loop that contains that WTN.

2. Left-handed FIDs are used to provide the SLA address information for each SLA identifier on the account. These FIDs can be identified by the lack of a virgule (/) before the SLA identifier, e.g., SLA 1111 – 1234 Main Street.

The address provided in the SLA FID will apply to any WTN on the account that has the same SLA identifier. This allows the system to return the SLA addresses one

time only, and link them to WTNs using the identifier. The Left-handed FIDs are not necessarily related to any single PO1 loop, and the flexibility of the ordering systems and processes over the years has allowed for this information to fall in various places of an account. Since they are not associated with any specific PO1 loop on the response, they can be returned in an SLN loop that is subordinate to any PO1 loop on the response.

9. Hunting information will be parsed and fielded as documented on the CSI Sample Mapping documentation when the information can be provided in that format by the back-end systems. Raw hunting data will also be returned in the FEATURE DETAIL field, which is mapped to the SI Segment using a FD qualifier in the SLN loop.

   The Floating FIDs carrying the Hunt Group Identifiers are tied to a WTN on the account, and will be mapped in the SLN loop that is subordinate to the PO1 loop that contains that WTN.

   Fielded HT and HTSEQ, as well as Left-handed FIDs containing Hunting information, will be mapped in SLN loops subordinate to the PO1 loop that contains the Hunting Service Details

10. USOCs and FIDs are used to pass Calling Card information on a CSI Response. USOCs are mapped to the SI Segment using an SC qualifier in the SLN loop of the response. FIDs are mapped to the SI Segment using a FD qualifier in the SLN loop.

    These USOCs and FIDs can come back in the SLN loop that is subordinate to any PO1 loop on the response.

Witness Responsible: Mark Cottrell